



USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC # \_\_\_\_\_  
DATE FILED: 4/21/2021

U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

## MEMO ENDORSED

April 20, 2021

### BY ECF

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

The April 22 status conference is adjourned to June 3, 2021, at 11:00 a.m. The conference will occur remotely and by telephone. The parties are instructed to call (877) 411-9748 and enter access code 3029857# when prompted. Speedy trial time is excluded from April 22, 2021, until June 3, 2021, in the interest of justice.

SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: 4/21/2021

Re: *United States v. Doran Santiago Ramos, 20 Cr. 4 (ER)* New York, New York

Dear Judge Ramos:

A status conference in the above-captioned matter is scheduled for April 22, 2021. The Government and defense counsel have been engaged in ongoing substantive discussions regarding a possible pretrial resolution, including recent exchanges of additional information. However, these discussions will not be completed in advance of the forthcoming conference. Therefore, the Government respectfully requests that the Court adjourn the conference for a period of approximately 45 days to continue these discussions.

In the event that the Court grants the requested adjournment, the Government respectfully requests that the Court exclude time under the Speedy Trial Act, from April 22, 2021 to the date that the conference is rescheduled to permit the parties to continue negotiations regarding possible pretrial disposition. The Government submits that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

I have communicated with defense counsel, who has consented to the above requests.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By:   
Brett M. Kalikow  
Assistant United States Attorney  
(212) 637-2220

cc: Zawadi S. Baharanyi, Esq. (via ECF)